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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 WEBSITE MANAGEMENT SYSTEMS,  
LLC, a Nevada Limited Liability  
9 Company

Case No.: 2:20-cv-00213

10 Plaintiff,

11 v.

**DECLARATION OF ROBERT RASKIN IN  
SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION**

12 BENJAMIN DAILED, an individual  
residing in Nevada, MELVIN OMAN, an  
13 individual residing in Nevada, DEVAN  
HIRST, an individual residing in Nevada,  
14 YES WE WILL, INC., a Nevada  
Corporation, and DOES 1-X,

15 Defendants.  
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18 **DECLARATION**

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20 I, Robert Raskin, declare as follows:

21 1. I am a consultant to Website Management Systems, LLC ("WMS") which is a  
22 Nevada Limited Liability Company with a principal place of business at 7241 W. Charleston,  
23 Las Vegas, NV 89117. I manage many aspects of WMS business in association with my wife,  
24 Kathleen Raskin, who is the Managing Member of WMS.

25 2. While WMS has determined with factual certainty that existing and would-be  
26 customers of WMS have been contacted by Defendants through Yes We Will, Inc. and its 1<sup>st</sup>  
27 Page Group, I have also seen an increase in the number of requests for refunds since Defendants  
28 Daileda, Oman and Hirst left to start their competing business. I strongly believe this increase is

DECLARATION OF ROBERT RASKIN

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1 due to Yes We Will, Inc. and 1<sup>st</sup> Page Group contacting our existing and would-be customers. It  
 2 is also noted that the refund requests are coming from customers that were signed up with WMS  
 3 by Benjamin Daileida while he was an employee of WMS. These requests for refunds are  
 4 directly placing WMS' merchant accounts at risk. Without the merchant accounts, WMS'  
 5 business as a whole is in jeopardy.

6 3. WMS is a computer-reliant company and has in excess of 70 computers on hand  
 7 at its facility. There are also a significant number of speakers for the computers. I have never  
 8 been informed by any employee, including Benjamin Daileida, that they were in need of  
 9 computer speakers. Nor was I made aware that Benjamin Daileida was forwarding business calls  
 10 to his personal email address or I would have immediately put a stop to such improper actions.

11 4. On or about January 1, 2015, WMS took over for KJR Management as the  
 12 employee management arm for the business including overseeing the rights to the various  
 13 agreements (e.g., employment and confidentiality agreements) that the employees had signed  
 14 with KJR. The employees were made aware of the change. (See, Exhibit A hereto). KJR  
 15 remains active and handles various WMS matters. Both entities have the same manager and are  
 16 run by Kathleen Raskin.

17 I declare under penalty of perjury pursuant to the laws of the United States of America that  
 18 the foregoing is true and correct.

20 Dated: March 2, 2020

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 22 ROBERT RASKIN

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 DECLARATION OF ROBERT RASKIN